

Via: Electronic Mail
gregf@edgewaternj.org

December 9, 2014

Mr. Gregory S. Franz, Borough Administrator
Borough of Edgewater
55 River Road
Edgewater, NJ 07020

Re: Variance to the USEPA-approved PCB Self-Implementing Cleanup Plan
Veterans Field
1167 River Road
Edgewater, New Jersey 07020

Dear Mr. Franz:

To facilitate the timely completion of the remediation activities currently being implemented at the above-referenced site (the "Site"), First Environment, Inc. (First Environment) respectfully requests that the Mayor and Council review the following information which pertains to a variance to the United States Environmental Protection Agency (USEPA)-approved Self-Implementing PCB Cleanup Plan (SIP) dated August 2014.

Since early October 2014, Enterprise Network Resolutions Contracting, LLC (ENRC), under the direct supervision of First Environment, has implemented numerous tasks at the Site in accordance with their Contract, including the excavation and off-site disposal of PCB-impacted material. Based on the work completed to date, the laboratory analytical results for post-excavation samples collected from the base of the northern parking lot area revealed PCB concentrations above NJDEP/USEPA soil cleanup criteria. Due to the depth of contamination and proximity of the groundwater table (ranges from 4.0 to 5.0 feet below ground surface (bgs)), excavating below the groundwater table to achieve the previously approved PCB cleanup criteria (0.2 parts per million) may prove technically challenging and financially impracticable. Therefore, two remedial alternatives (i.e., variances) are available to address PCB impact detected at or below the groundwater table:

1. Continue to excavate below the groundwater table in an effort to remove PCB-impacted material to the previously approved cleanup criteria. This option would require extensive dewatering of the excavation area and off-site disposal of groundwater.
2. Continue to excavate PCB-impacted material in accordance with the bid specification and USEPA-approved SIP. For those locations that extend to the groundwater table but continue to exhibit PCB concentrations above 0.2 parts per million (ppm), confirm that PCB concentrations are below 10 ppm (the USEPA High Occupancy Use Cleanup Level) and cap the remaining PCB-impacted material with proposed infrastructure (i.e., asphalt parking lot and concrete sidewalks/curb lines) or with a clay layer that meets USEPA permeability requirements.

New Jersey

California

Georgia

Illinois

Mississippi

New York

Puerto Rico

Canada



Both remedial alternatives are protective of human health and the environment and will not restrict the use of the property. Based on the potentially significant costs associated with dewatering and excavation/off-site disposal of additional material, as well as the protracted timeframe for completing the remediation, it is our recommendation that the Borough submit a Variance to the USEPA-approved SIP. The Variance will allow for the capping of material below grade at a depth of approximately four to five feet.

We look forward to discussing these remedial alternatives with the Mayor and Council during tonight's meeting.

Best regards,

FIRST ENVIRONMENT, INC.

A handwritten signature in black ink that reads "Thomas C. Bambrick". The signature is written in a cursive, flowing style.

Thomas C. Bambrick, LSRP
Director of Site Investigation and Remediation